

DOMINION CITRUS, LTD.
Ontario Food Terminal
165 The Queensway Room 304
Etobicoke Ontario M8Y 1H8
and

07-50 -

FRESH FRUIT S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco
and

AGRI SOUSS
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco
and

EL BOURA
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco
and

GPA
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco
and

LIMONA SOUSS
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco
and

PRIAGRUS
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 JAN 26 PM 1:31

Plaintiffs
v.
M/V BADRINATH. her engines,
machinery, tackle, apparel, etc
and
AMER SHIPPING LTD.
602, Ghinis Building
58-60 Dhigenis Akritas Avenue
PO Box 27363, Nicosia 1644
Cyprus
and
ASHWATER NAVIGATION CO. Ltd.
602, Ghinis Building
58-60 Dhigenis Akritas Avenue
PO Box 27363, Nicosia 1644
Cyprus
and
SEATRADE REEFER CHARTERING N.V.
Atlantic House (4th fl.)
Noorderlaan 147, PO Box 10.012
2030 Antwerp 3, Belgium
and
SEATRADE GROUP, INC.
Atlantic House (4th fl.)
Noorderlaan 147, PO Box 10.012
2030 Antwerp 3, Belgium
and
SEATRADE USA
442 W. Kennedy Blvd., S. 290
Tampa, FL 33606 USA
Defendants.


: NO. 07-cv-50

MOTION FOR APPOINTMENT OF SUBSTITUTE CUSTODIAN

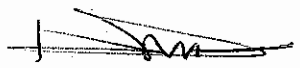
Plaintiffs hereby move for an order appointing Alpha Centurion Security, Inc., substitute custodian of the defendant vessel as set forth in the above caption. Plaintiffs herewith file an Affidavit supporting this Motion and a draft Order.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion.

Lee C. Goldstein Esq.

By: 
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Wilmington, DE
Attorney ID No. 231

MATTIONI, LTD.

BY: 
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(215) 629-1600

Dated: January 26, 2007